

LATHAM & WATKINS LLP
 Steven M. Bauer (Bar No. 135067)
 steven.bauer@lw.com
 Sadik Huseny (Bar No. 224659)
 sadik.huseny@lw.com
 Shannon D. Lankenau (Bar No. 294263)
 shannon.lankenau@lw.com
 505 Montgomery Street, Suite 2000
 San Francisco, CA 94111
 Telephone: 415.391.0600
 Facsimile: 415.395.8095

LATHAM & WATKINS LLP
 Richard P. Bress (admitted *pro hac vice*)
 rick.bress@lw.com
 Melissa Arbus Sherry (admitted *pro hac vice*)
 melissa.sherry@lw.com
 Anne W. Robinson (admitted *pro hac vice*)
 anne.robinson@lw.com
 Tyce R. Walters (admitted *pro hac vice*)
 tyce.walters@lw.com
 Genevieve P. Hoffman (admitted *pro hac vice*)
 genevieve.hoffman@lw.com
 Gemma Donofrio (admitted *pro hac vice*)
 gemma.donofrio@lw.com
 555 Eleventh Street NW, Suite 1000
 Washington, D.C. 20004
 Telephone: 202.637.2200
 Facsimile: 202.637.2201

LAWYERS' COMMITTEE FOR
 CIVIL RIGHTS UNDER LAW
 Kristen Clarke (*pro hac vice* forthcoming)
 kclarke@lawyerscommittee.org
 Jon M. Greenbaum (Bar No. 166733)
 jgreenbaum@lawyerscommittee.org
 Ezra D. Rosenberg (admitted *pro hac vice*)
 erosenberg@lawyerscommittee.org
 Dorian L. Spence (*pro hac vice*
 forthcoming)
 dspence@lawyerscommittee.org
 Ajay P. Saini (admitted *pro hac vice*)
 asaini@lawyerscommittee.org
 Maryum Jordan (Bar No. 325447)
 mjordan@lawyerscommittee.org
 Pooja Chaudhuri (Bar No. 314847)
 pchaudhuri@lawyerscommittee.org
 1500 K Street NW, Suite 900
 Washington, D.C. 20005
 Telephone: 202.662.8600
 Facsimile: 202.783.0857

*Additional counsel and representation
 information listed in docket*

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

NATIONAL URBAN LEAGUE et al.,

 Plaintiffs,

 v.

 WILBUR L. ROSS, JR., et al.,

 Defendants.

CASE NO. 5:20-cv-05799-LHK

**DECLARATION OF SADIK HUSENY
 IN SUPPORT OF PLAINTIFFS'
 OPPOSITION TO MOTION TO
 SHORTEN TIME AND TO EXPEDITE
 BY STATES OF LOUISIANA AND
 MISSISSIPPI**

Date: TBD
 Time: TBD
 Place: Courtroom 8
 Judge: Hon. Lucy H. Koh

1 I, Sadik Huseny, declare as follows:

2 1. I am an active member of the State Bar of California, a member in good standing
3 of the Bar of this Court, a partner at Latham & Watkins LLP, and counsel for various Plaintiffs
4 in the above-titled action. I make this declaration in support of Plaintiffs' Opposition to Motion
5 to Shorten Time and to Expedite by States of Louisiana and Mississippi (the "Motion"). I have
6 personal, first-hand knowledge of the matters set forth below and, if called as a witness, I could
7 and would testify competently thereto.

8 2. Exhibit 1 to the St. John declaration (Dkt. 206-2) sets forth the entirety of the
9 communications Plaintiffs received in connection with the Motion.

10 3. As Exhibit 1 shows, Mr. St. John reached out to counsel for all parties at 7:41
11 p.m. ET / 4:41 p.m. PT—less than twenty minutes after the Preliminary Injunction Hearing
12 concluded. While Mr. St. John demanded the parties' positions by 6:00 a.m. PT—less than 14
13 hours later—he did not even provide drafts of the motions for the parties to consider.

14 4. After conferring with all the Plaintiffs, I responded the next day, at 8:47 a.m. PT
15 (my local time zone). As stated in my email, in light of the procedural posture of the case,
16 Plaintiffs requested additional information, including the draft pleadings. Without drafts,
17 Plaintiffs could not adequately consider Mr. St. John's stated plan to ask for a 24-hour response
18 time to the Motion to Intervene, as Plaintiffs did not even know what they would be responding
19 to. Because my understanding is that the Governor's office of Louisiana manages Census
20 operations there, we also requested information about who from the office managing the Census
21 in Louisiana was involved in the motion. Finally, we requested to know what other states may
22 be involved, as Mr. St. John only vaguely referred to other states in his first email.

23 5. In responding four hours later, Mr. St. John provided none of the requested
24 information. Instead, he provided a unilateral 1-hour window deadline within which to call him.

25 6. The Court should deny the Motion to Shorten Time and to Expedite for the
26 reasons set forth in Plaintiffs' accompanying opposition. Louisiana and Mississippi did not
27 engage in a meaningful meet and confer, as contemplated by the local rules. Indeed, Mr. St.
28 John does not appear affiliated with Mississippi, and therefore, Mississippi did not meet and

1 confer with Plaintiffs at all. The Motion requested an unreasonable deadline to respond to the
2 Motion to Intervene. That deadline is now moot, but the Motion to Intervene suffers from
3 procedural and substantive problems, as touched on in the accompanying Opposition, that should
4 be briefed and heard by the Court on a reasonable timetable.

5
6 I declare under penalty of perjury that the foregoing is true and correct.

7
8 Executed on: September 28, 2020

LATHAM & WATKINS LLP

9 By: /s/ Sadik Huseny
10 Sadik Huseny

11 Sadik Huseny (Bar No. 224659)
12 **LATHAM & WATKINS LLP**
13 505 Montgomery Street, Suite 2000
14 San Francisco, CA 94111
15 Telephone: 415.391.0600
16 Facsimile: 415.395.8095

17 *Attorney for Plaintiffs National Urban League;*
18 *League of Women Voters; Black Alliance for*
19 *Just Immigration; Harris County, Texas; King*
20 *County, Washington; City of San Jose,*
21 *California; Rodney Ellis; Adrian Garcia; and*
22 *the NAACP*